

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALI KARIMI, Individually and On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT, JOHN
CRYAN, AND CHRISTIAN SEWING,

Defendants.

Case No. 1:22-cv-02854 (JSR)

**DECLARATION OF EMMA GILMORE IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, Emma Gilmore, declare as follows pursuant to 28 U.S.C. §1746:

1. I am a Partner of the law firm of Pomerantz LLP, court-appointed Lead Counsel for Lead Plaintiff Yun Wang (“Wang” or “Lead Plaintiff”) and Named Plaintiff Ali Karimi (“Karimi” or “Named Plaintiff,” and, with Wang, “Plaintiffs”) and the proposed Settlement Class. I am admitted to practice before this Court. I respectfully submit this declaration in support of Lead Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the matters testified to herein.

2. I hereby certify that I conferred with counsel for Deutsche Bank Aktiengesellschaft, John Cryan, and Christian Sewing, regarding the relief requested in the Motion. This Motion is unopposed.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Stipulation and Agreement of Settlement, dated as of September 23, 2022 (“Stipulation”). The exhibits to the stipulation are as follows:

- Exhibit A: [Proposed] Order Preliminarily Approving Settlement and Providing for Notice.
- Exhibit A-1: Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses.
- Exhibit A-2: Proof of Claim and Release Form.
- Exhibit A-3: Summary Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses.
- Exhibit A-4: Postcard Notice.
- Exhibit B: [Proposed] Judgment Approving Class Action Settlement.

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from a report by NERA Economic Consulting, authored by Janeen McIntosh and Svetlana Starykh, and titled *Recent Trends in Securities Class Action Litigation: 2021 Full-Year Review*.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct. Executed this September 23, 2022 at New York, New York.

/s/ Emma Gilmore

Emma Gilmore

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of September 2022, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Emma Gilmore

Emma Gilmore